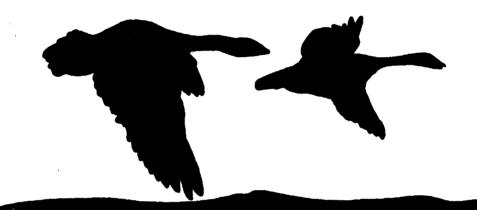
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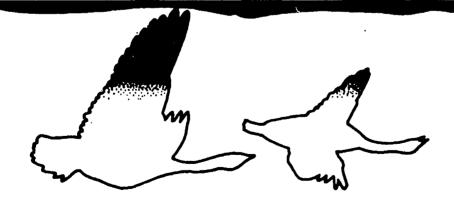
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A REVIEW OF THE PROPOSED



WILDLIFE ORDINANCE



A REVIEW

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THE PROPOSED WILDLIFE ORDINANCE

PREPARED FOR NORTHWEST TERRITORIES COUNCIL

ΒY

THE FISH AND WILDLIFE SERVICE
DEPARTMENT OF NATURAL AND CULTURAL AFFAIRS

APRIL 7, 1977.

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I. INTRODUCTION

The decision to revise the Game Ordinance was made in ine. 1972. The main reasons for the decision are that some sections of the Conce are unnecessarily restrictive, while other sections do not sufficiently protect our wildlife resources. The Ordinance is difficult to read and understand as it is now written and organized.

The Northwest Territories Fish and Wildlife Service began talking with hunters and trappers about new wildlife laws through its officers in the field. It soon became apparent that the present Ordinance was so poorly understood that people could not make recommendations for major changes to the laws. The Service then employed Mr. Frank Baily, retired Wildlife Officer and 50 year resident of the North, to explain the present laws and record the concerns and recommendations of the people about wildlife legislation. He visited 52 communities since September, 1975, and completed his work in April, 1977. His report has been made available to the Council of the Northwest Territories.

The Game Advisory Council began its review of the proposed Wildlife Ordinance in May, 1976, and will continue the review through the summer of 1977. Their recommendations, plus those given by the general public to Frank Bailey, are the foundation of the Ordinance proposal given to the Council of the Northwest Territories. However, certain recommendations seem to be contrary to the policies and goals of the Fish and Wildlife Service. It is the purpose of this paper to point out these differences so that you will be better prepared to give the government constructive criticism and suggestions.

II. WHY IS THE REVISION OF THE GAME ORDINANCE IMPORTANT TO NORTHERNERS

The Northwest Territories Game Ordinance, which specifies the powers of the Commissioner for regulating the human use of wildlife, touches the lives of more people in the Northwest Territories than perhaps any other Northwest Territories legislation. Hunting, fishing, and trapping have sustained the native populations of the Northwest Territories for millenia. The pursuit and enjoyment of wildlife still play a most important role in their culture and their physical and mental well-being. The abundant populations of fish and wildlife thriving in their natural habitats enhance the quality of our lives in the Territories. the North's mystique and attraction stem in large part from the abundance of wildlife and wildlands, and the opportunities which they afford for hunting, fishing and travelling. Wildlife also brings considerable income to the people of the Northwest Territories, directly through the sale

of fish, fur, and game, and indirectly through tourism, sport hunting, and sport fishing. It is therefore of greatest importance that all people living within the Northwest Territories have the opportunity to express their views on, and make a contribution to, the proposed changes in the Game Ordinance.

Although northerners have been encouraged by Mr. Bailey and the Game Advisory Council to study and to participate in redrafting our wildlife laws, there still seems to exist a certain mystery about what the Fish and Wildlife Service does and how it arrives at recommendations for regulating the human use of wildlife. Most people are aware only of the laws controlling hunting, trapping, and fishing and do not understand the reason behind the laws.

Therefore, we wish to answer some questions about the Fish and Wildlife Service, its jobs, and its legal responsibilities to the people of the Northwest Territories.

III. WHY IS THE FISH AND WILDLIFE SERVICE NECESSARY?

Native people and long time residents of the Northwest Territories often protest that they got along quite well in the past without hunting and fishing laws and without wildlife management. During Mr. Bailey's meetings in the communties, he regularly heard the argument that the people should enjoy unrestricted hunting rights as they did in the past, or that quotas which are imposed on hunting of such species as muskox and polar bear were too restrictive.

It is easy to see how such ideas arose. During most of the history of the Northwest Territories - indeed until very recently - few people lived here. For example, the actual Inuit population of the Northwest Territories was only 8.007 in 1961, whereas the projected Inuit population in 1981 is estimated to be 16.200. The Indian and Metis population was 5,200 in 1961, and is projected to be 9,874 in 1981. The native people used traditional methods of hunting and travelling. Spears, bows and snares were the methods commonly employed to kill game. Travel was limited to canoes and kayaks, dog teams, and walking. These small numbers of people, with their restricted methods of travel and traditional hunting methods could not kill too many animals. People lived in balance with the land, and game management was not necessary.

Times have changed. There are many more people in the Northwest Territories now; most of them wish to hunt and fish. What is more, these new hunters have equipemnt which makes finding and killing game much easier. Aircraft allow even the most remote areas to be reached quickly. Game can be spotted from the air. Outboard motor boats and snowmobiles make travel many times faster than by the old methods. These

machines can be used to chase down animals that would have gotten away in the past. High powered rifles with telescopic sights, steel traps, modern fishnets and many other devices make it easier for the modern hunter or fisherman to take any amount of game.

Man is no longer in balance with the land. We know of several examples in which so many animals were killed that species were almost driven to extinction by native and white hunters alike. Over-hunting almost eliminated muskoxen in the Northwest Territories and did exterminate them in the Yukon and Alaska. Only the establishment of sanctuaries and a ban on hunting saved muskoxen in the Northwest Territories. The caribou on Southampton Island were entirely killed off by over-hunting. Even recently, snowmobiles and high powered rifles allowed hunters to wreak wasteful slaughter on caribou at Coppermine. Our game populations cannot survive in the face of such unlimited and uncontrolled hunting.

Our new technology has also made possible the destruction and pollution of habitats used by fish and wildlife. Roads, dams, pipelines, and other industrial activities could all be destructive to wildlife habitat if not carefully planned and regulated.

To see what could happen here, northerners need only look at the history of the North American west, which was once as rich in wildlife and as much of a frontier as the North is today. The buffalo, the grizzly bear, and many other species of wildlife were slaughtered by hunters and their habitat was destroyed by agriculture, industry, and pollution. Only the control of hunting and of activities which were destroying wildlife habitats have allowed the wildlife to survive.

Throughout the southern part of Canada and the United States, wildlife management has long been accepted as necessary to ensure the survival of fish and wildlife. All provincial and state governments have agencies to protect their wildlife resources. Wildlife management is necessary now in the North also. The time has passed when wildlife management can be left to chance and to the hope that people will exercise restraint.

IV. WHAT DOES THE FISH AND WILDLIFE SERVICE DO?

The main job of the Fish and Wildlife Service is to ensure that the game animals, birds, fur-bearers, and fish continue to thrive in their natural habitats in the Northwest Territories for the use and enjoyment of the people. This entrusts the Fish and Wildlife Service with the task of watching over wildlife resources so that they are not depleted by overuse or careless human activities. Ideally, fishermen, hunters, and trappers should take only the number of animals which a population

can spare each year without decreasing. Similarly, industrial activity should not harm animals populations or the places where they live by pollution, disturbance, or destruction of the land.

In order to guarantee the continued abundance of wildlife in the Northwest Territories, the biologists and officers of the Fish and Wildlife Service must keep track of the number of animals in the wildlife populations, as well as the numbers being killed or caught by native hunters and trappers and by sport hunters. They must also collect information on the birth rates, death rates, behaviour, and diseases of animals in the Territories as well as on their use of habitats. Only by collecting this information can the Fish and Wildlife Service fulfill its responsibility to detect decreases or increases in our wildlife populations, find out why they are occurring, and recommend ways to stop any decline so that the populations may return to their original numbers. Before wildlife management was practiced in the Northwest Territories, some populations such as those of the muskox and bowhead whale were driven almost to extinction. This must not happen again with any of our wildlife species.

The job of keeping track of fish and wildlife populations cannot be done casually or as easily as some people think. It may appear to a hunter or fisherman that animals are still abundant even when a population has greatly declined. For example, in Alaska recently the Arctic Caribou herd declined rapidly from 250,000 animals to less than 50,000. Native hunters thought there were still plenty of caribou because the animals continued to migrate past their villages so their hunting continued to be successful. Yet if the hunting had continued in the same way, the caribou would have been wiped out in a few years, and everyone would have suffered from the mistake. A proper job of managing wildlife requires scientific training in the field of estimating fish and wildlife populations, seasonal distribution and movements, and productivity. The biologists and officers of the Fish and Wildlife Service are hired because they have this training. When they make recommendations to limit hunting or to restrict an industrial activity, those recommendations are intended to insure that the wildlife populations will continue to flourish.

Of course, fish and wildlife laws must be enforced to be effective. Fish and Wildlife Officers are also trained in effective and proper enforcement of laws designed to protect wildlife.

The Fish and Wildlife Service also tries to advise and assist residents of the Northwest Territories on the best ways to use the fish and wildlife which are available. This may include informing fishermen and trappers about new equipment, providing advice on preparing or preserving animals or furs and hides, and providing advice about marketing furs. Information about wildlife is also provided to people who wish to enjoy wildlife by observation, photography, or study.

V. WHAT ARE THE DIFFICULTIES IN CARRYING OUT THE WORK OF THE FISH AND WILDLIFE SERVICE?

As was stated earlier, the major responsibility of the Fish and Wildlife. Service is to maintain the fish and wildlife populations in their natural habitat. The information required for proper management of wildlife populations is not easily acquired. Some populations such as those of caribou or polar bear are remote, constantly moving, and often occupy huge areas. One cannot just go out and fly for a few hours in a helicopter and properly assess a population. The surveys must be carefully planned, and scientifically carried out and analyzed. The Fish and Wildlife Service is still developing techniques for estimating the numbers and productivity of important fish and wildlife species.

Sometimes, funds are inadequate for the studies. For example, in Alaska, the Arctic caribou herd was estimated at 250,000 animals in 1972. No further surveys were funded until 1976 when it was suddenly discovered that only 50,000 remained. The lesson to be learned is the necessity to be ever vigilant of the status of important big game populations. One of the major caribou herds in the Northwest Territories could just as easily decline without anyone being aware unless surveys were conducted regularly.

Some people may object to funds being spent to monitor game populations, or to the slight degree of disturbance that surveys may cause the animals. The loss of game through lack of information would be much worse.

Similar problems arise when we try to estimate the numbers of animals being killed. Hunters may unintentionally misrepresent their kills. Wounded animals may escape the hunter only to die later. These may not be reported as killed by the hunter, yet they are lost to the population. In many cases, caribou are cached on the land. If Fish and Wildlife Officers are counting only game brought into a settlement, then these cached animals are not included in the kill. For all the above reasons, the human kill from a game population may be underestimated, thus masking the fact that a population may be declining.

Another difficulty for the Fish and Wildlife Service is the lack of control over activities which might destroy wildlife habitat. Most decisions regarding land use are made by other agencies and the Fish and Wildlife Service can only make suggestions about how these activities should be regulated to avoid damage to habitat. Moreover, in many cases we do not yet have the knowledge to say which habitats are important to wildlife, or how activities then will affect wildlife populations. Thus continued research is required to improve our knowledge of the habitat requirements of northern wildlife, and of the effects of industrial exploration and development activities on wildlife.

VI. WHY DOES THE GAME ORDINANCE NEED REVISION?

As a result of the consultation meetings held in the various settlements, a number of people were not convinced that any change to or revisions of the Game Ordinance were necessary. There seemed to be a certain amount of fear that if the laws were changed in any way, the hunting rights of native people would be undermined in the process. The fears expressed are understandable, however the intent of a revision of the existing game laws is to ensure protection of the wildlife resources, and to protect the privileges of the indigenous people who are the prime resource users.

The proposed Wildlife Ordinance was based on the premise that the native people of the Northwest Territories have the first claim on the use of fish and wildlife resources. Any wildlife surplus to the requirements of the subsistence users should be managed for the benefit of all residents and non-residents. The aesthethic values of fish and wildlife have been recognized and should be developed for the enjoyment of both residents and non-residents. These premises are not adequately reflected in the present Game Ordinance.

The Wildlife Ordinance must be the enabling legislation from which effective regulations can be developed to maintain wildlife in its natural environment, and provide the tools with which the Fish and Wildlife Service can fulfill the mandate to manage properly. Included in the body of the current Ordinance are section which are regulatory in nature, and these sections should be in the game regulations. Because they are not, they cannot be changed except by the Territorial Council. This creates unnecessary delays in responding to problems, or requests from the people for changes to laws.

Many ambiguities and conflicts exist in the present Game Ordinance which cannot be effectively dealt with except by a complete revision. Many situations, conditions, institutions, and potential problem areas have been identified recently, and the existing Game Ordinance is not empowered to deal with these matters offectively.

Industrial exploration and development activity will have important effects on wildlife. Adequate wildlife legislation does not exist which can protect the fish and wildlife during major development projects such as a pipeline. A delay in the enactment of adequate wildlife laws could pose insoluble problems should major development projects occur.

VII. DIFFERENCES OF OPINION

A. Who Owns Wildlife? (Sections 72, 73, 74, and 75)

Opinions differ about who owns wildlife in the Northwest Territories, the government or the native people of the Northwest Territories. This important question will be answered by the Federal Government during native land claims negotiations. Presently, free-roaming wildlife in the Northwest Territories is considered to be held in trust for the people of Canada, by the Government of Canada. An individual and take legal possession of wildlife under the provisions of a federal act or with a government licence or permit.

It is assumed in the current and proposed Ordinances that the Northwest Territories Council has the authority to make laws concerning the disposition of wildlife not taken under the provisions of a licence or permit. For example, the Fish and Wildlife Service believes that the hides and pelts of animals become Government property. At present, such hides and pelts are disposed of through public auction, and money from the sales are deposited in the general revenue of the Northwest Territories Government.

Generally, native hunters and trappers believe that all wildlife, including parts such as hides and pelts, belong to the native people and should be disposed of by Hunters' and Trappers' Associations if not taken by licence or permit or for food as allowed in the Northwest Territories Act. They say that money from the sale of such hides and pelts should go to the communities.

The Fish and Wildlife Service agrees that funds from the sale of hides, pelts, meat and other parts of wildlife that they have confiscated should be used for the benefit of community residents. However, the Service believes that all financial incentive to kill animals except under a licence or permit should be removed. The quota system on certain animals will work only if the numbers of those killed in addition to the quota are kept as low as possible. If incidental killings increase drastically, then existing quotas may require review and adjustment in order to protect the species. For example, man's conflict with polar bears has shown a marked rise in incidence in recent years. The hides of these bears are valuable. If the hides were to remain the property of individual hunters or the Hunters' and Trappers' Associations then hunters would be tempted to kill problem bears immediately, rather than make serious efforts to drive them away. Polar bears have been chased away from camps successfully, and much work is being done to develop effective polar bear deterrents. Other examples include wildlife found dead, or killed accidentally. This could result from accidents with vehicles on roadways, for example. Often these birds or animals, or the pelts or parts are valuable. To ensure that no incentive exists to

disregard the law, and to maintain credibility, it is not wise to allow an individual to claim ownership of valuable, accidentally killed wildlife. A peregrine falcon for example, is of considerable worth as a mounted specimen.

B. General Hunting Licences (Section 34)

The privilege of holding a Generalnting Licence is perhaps the most controversial issue addressed by the proposed Ordinance. It involves rights set down in acts and treaties, and for the Metis and non-status Indians it is a symbol of their claim to aboriginal rights. Substantial changes to the present General Hunting Licence privileges would involve changes to a federal act, changes that will not be made before native land claims are settled.

However, many natives and non-native hunters and trappers recognize the need to control the harvest of wildlife in our rapidly developing northland. They realize that the General Hunting Licence allows the killing of wildlife in any season, and in any number, regardless of the condition of wildlife populations. They are also aware of the fact that the population of those eligible to hold General Hunting Licences is steadily increasing, as children inherit the privileges of the licence. They realize that voluntary restraints on hunting are usually ineffective.

Added to this problem of lack of control under the General Hunting Licence is the right of all treaty Indians and all Eskimos to kill animals for food in any number during any season. The only animals that can be protected by law are those listed as being in danger of becoming extinct: muskox, polar bear, wood bison, and barren-ground caribou. All other species, such as mountain sheep, moose, plains bison, and woodland caribou are vulnerable to unrestricted harvest.

The threat of over-harvesting under the General Hunting Licence system and under the provisions of the Northwest Territories Act is embodied in the statistics on the growth rate of the population of the Northwest Territories. The actual total population of native people, Eskimo, Treaty, Non-status Indians, and Metis stood at 13,234* in 1961. In 1977, the total is estimated at 22,790, and the projected estimate for the year 1981 is expected to be 26,110 native people.

Though the proposed Wildlife Ordinance does not significantly change the current General Hunting Licence system, some system of controlled harvest must be built into future wildlife laws, a system that will not jeopardize the special status of indigenous people who rely on wildlife for their well-being. Suggestions for such a system should come from the people themselves, through their political organizations, and through their Hunters' and Trappers' Associations.

Statistics Canada publications.

C. Bartering, Selling, and Gifts of Game Meat (Sections 77, 118, and 113)

The hunter is proud of his ability to share the animals he has killed with the people of his community. Such generosity is the mark of a respected hunter. Furthermore, it is expected of him. Therefore the restrictions on the free exchange of meat stated in the Ordinance are a source of concern and irritation to native people.

The restrictions called for in the Ordinance and regulations are designed to prevent people who do not have General Hunting Licences from taking advantage of the privileged hunter for his own personal profit. The unrestricted exchange of meat between these two classes of people may result in an uncontrollable increase in the numbers of animals killed. Subtle pressures are often brought to bear upon holders of General Hunting Licences to provide significant quantities of game meat, horns, or hides to employers, friends, acquaintances, or non-eligible relations. The practise circumvents the intent of the General Hunting Licence. A hunter who gives meat or parts of game away in this manner must then go hunting again to provide additional animals for his own use.

The intent of the laws providing for the commercial sale of game meat is to allow native hunters to profit financially from the harvest of wildlife resources that are surplus to their own sustenance needs. If a wildlife population cannot safely provide such a surplus, then commercial sale cannot be permitted. Unrestricted hunting for profit has caused the decline and local extermination of wildlife populations throughout North America. The decline of the muskoxen in many areas of the Northwest Territories is an example. The proposed Ordinance will allow the people of the Northwest Territories to use their wildlife for food and financial gain without suffering the consequences of over-harvest.

D. Wildlife Held in Captivity (Sections 72 and 117)

Some native hunters and trappers wish to hold wildlife in captivity and don't understand why this practice is restricted. The proposed legislation mainly reflects the concern of the Fish and Wildlife Service for the humane treatment of wild animals, the control of diseases which could spread to the wildlife environment, and the development of hybrid strains which, if released into the wild, could interbreed with purebred wildlife. Wild animals, as a rule, do not make good pets, and therefore the keeping of wildlife in captivity is discouraged except as specifically allowed in the Wildlife Regulations.

E. Wolf Bounties

There are few more emotional subjects than wolves, wolf control, and wolf

bounties. For years, the wolf bounty has been a source of income and satisfaction to hunters and trappers in the North. Wolves, after all, seem to be competing with them for meat and furs, and the bounty appeared to be hastening the decline of the wolf populations. Therefore, hunters and trappers opposed the elimination of the wolf bounty and want it reinstated in the new Ordinance.

The bounty system is as old as wildlife management in North America. However, it has been amply demonstrated that the bounty system is mostly a welfare scheme that does not significantly effect the control of predators. For that reason, the bounty system has been discontinued in all provinces and states of North America.

The incentive to kill wolves is adequatly built into the value of the wolf pelt itself and its value as a trophy to sport hunters. The wolf, like other animals in our Northland, is a valuable component of our wildlife heritage, and one, like others, that we can manage for the greatest profit of the greatest part of our population.

F. Request for a Quota on Barren-Ground Grizzly

The Inuit of the Keewatin have requested a quota to allow the hunting of barren-ground grizzly bears. This is a reasonable request which the Fish and Wildlife Service approves in principle. However, the establishment of a quota at this time is premature. There have been no studies initiated on this animal and consequently there is little information on which to base a quota. The information provided by hunters and trappers is valuable and is used effectively in a study. However, the procedure followed by biologists in assigning or recommending quotas is to base any quota or change in quota upon sound information on the abundance and productivity of a population. Such information will be gathered as soon as budgets are approved for the necessary surveys.

G. Request for Increased Quotas on Polar Bear

The same principles stated for grizzly bears apply to polar bears. Any new quotas or changes to existing quotas must be based on facts established through management surveys. Many Inuit hunters do not agree with these principles, and some do not feel quotas are necessary at all. They feel they have sufficient information on the bears and would be able to control the hunting of polar bears themselves. Almost all the hunters in the Arctic settlements believe that polar bear quotas should be raised.

The Fish and Wildlife Service is not opposed to increasing the quotas provided the various sub-populations can favourably withstand such increases. The basic principles of wildlife management still apply, and the studies of polar bears are proceeding at a speed directly reflecting available manpower and funding.

The criticism by the hunters and trappers that progress on research has been too slow is valid. This however is not grounds for departing from proven management procedures simply to satisfy the hunters in the short term who have a vested interest in higher quotas.

H. Protection of Polar Bear Dens (Section 63)

Some Inuit hunters would like to be allowed to break open the dens of polar bears when a male bear is inside. They also asked, through Mr. Bailey, why polar bear dens are protected and not the dens of black or grizzly bears.

The Fish and Wildlife Service protects polar bear dens because den disturbance can result in the death of young cubs. Females with cubs may leave dens after disturbance. The survival of the young under such circumstances may be jeopardized. It may not be possible for a hunter to ensure in every case that the denned animal is a male. The protection of dens is in line with the proper management of a species, and therefore the proposed Ordinance calls for the protection of all dens. Any executions to this law will be outlined in the Regulations.

Definition of a Northwest Territories Resident (Section 2; item (4-1))

The definition of a resident in the existing Game Ordinance is a person who has lived continually in the Northwest Territories for a period of six months. Frank Bailey learned that people were in general disagreement with the present definition. The people appeared to favor a period of residency of between one to ten years. The Game Advisory Council suggested residency requirements ranging from one year for hunting small game and two years for big game, to two years for small game and ten years for big game.

The Fish and Wildlife Service supports a general two year residency requirement for big game and small game. It is the opinion of the Service that a two year residency requirement would eliminate most individuals who move to the Northwest Territories for a particular project with no intention of making their permanent home here. They feel that such a requirement will bring no significant hardship or deprivation since these individuals will still be able to hunt most species as non-residents by paying higher licence fees. If restrictions on hunting activities becomes necessary however, non-resident hunting would be the first to be restricted or eliminated.

J. Aircraft Transportation for Hunting (Sections 56 and 57)

Modern aircraft have made large mammals so vulnerable to the hunter that they could seriously endanger entire populations. Moose, once the most difficult of species to hunt, now become relatively easy prey for the airborne hunter. Caribou can easily be killed, butchered, and shipped home on a Sunday afternoon within 100 miles of a large community or city. The harassment of game pursued by aircraft has become common, harassment that causes abortions and a variety of stress-related diseases and disabilities.

Native hunters and trappers have complained repeatedly about the use of aircraft by sport hunters, and would like to see it curtailed. However, they are not so happy when the Fish and Wildlife Service proposes to regulate the use of aircraft by all hunters, as the use of aircraft has become "traditional", and it is certainly the most economical means of hunting such animals as caribou. The caribou and moose, however, are even more vulnerable to airborned hunters holding General Hunting Licences than they are to sports hunters, as the sportsman is limited by law.

The activities of recreational hunters using aircraft must be contolled now. The control of the use of aircraft by all hunters must come eventually. The suggested imposition of a 12-hour waiting period between landing an aircraft and commencing a hunt will discourage the use of an aircraft as a hunting weapon rather than as just transportation. The intent of this law would be to protect vulnerable wildlife, not to bring unnecessary hardship to subsistance hunters.

K. Officer Powers to Arrest

The proposed Wildlife Ordinance permits a Fish and Wildlife Officer to arrest a violator without a warrant. The Game Advisory Council objected to this provision. This is not a new law; it has been in effect in the existing Game Ordanance for many years. This authority is also commonly found in Provincial wildlife laws.

The authority to arrest is rarely exercised in only the most extreme circumstances. If the authority were deleted from the Ordinance, certain types of violators would take full advantage of an officer's limited powers. Transients, for example, could leave the Northwest Territories after violating our laws without being detained by an Officer.

The Fish and Wildlife Service has an Enforcement Policy Manual which provides suitable guidance to Officers. Almost all Fish and Wildlife Officers have received enforcement training courses, and this program of training continues. Service policies and training will eliminate abuses of the authority to arrest without a warrant.

VIII. CONCLUSION

This document is a statement of professional opinion and philosophy intended to guide Councillors in their evaluation of the proposed Wildlife Ordinance. The relatively few areas of disagreement between the Ordinance draft and the recommendations of the Game Advisory Council is a reflection of the weeks of hard work and the good advice given by the Advisory Council to the Fish and Wildlife Service. The proposed Wildlife Ordinance is, in many respects, an Ordinance by and for the people of the Northwest Territories.

Many incidental points raised by the people have not been dealt with in this paper since they relate directly to existing regulations, which will change, or to the Migratory Birds Convention Act (Canada), which we cannot change. In many instances the appropriate changes have already been incorporated into the proposed Regulations.

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